



**Certified  
Environmental  
Services, Inc.**

7280 Caswell Street  
North Syracuse, NY 13212  
Phone 315-478-2374  
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April 19, 2013

Mr. Harry Warner  
***New York State Department of Environmental Conservation - Region 7***  
650 Erie Boulevard West  
Syracuse, New York 13

**Re: RH Law, Inc. - Spill #12-07324 Sampling Plan  
Five Receiving Locations of Possible PCB Contaminated Soil**

Dear Mr. Warner:

Certified Environmental Services, Inc. (CES) has been retained by Robert H. Law, Inc. (RH Law) to provide environmental support services regarding the PCB contaminated top soil pile staged at RH Law's facility as described in CES's PCB Contaminated Soil Pile Information Report dated January 25, 2012. As you are aware, some of the top soil from the subject pile had previously been redistributed, prior to the discovery of the PCB contamination, to five job sites that RH Law conducted work at within the Syracuse area. The five job sites/properties that have reportedly received soil from the subject pile are as follows:

- HW Smith School, 1130 Salt Springs Road, Syracuse, New York 13224
- St. Joseph's Hospital Health Center, 300 Prospect Street, Syracuse, New York
- Ultra Dairy, Fly Road, East Syracuse, New York 13057
- Institute of Technology, 258 East Adams Street, Syracuse, New York 13202-3025
- LeMoyne College - Coin Science Center, 1419 Salt Springs Road, Syracuse, New York 13214

The suspect top soil was used within various areas at the above listed project sites, generally finished as landscaped and grass areas. RH Law has maintained project drawings for each site indicating the areas that the suspect soil was used. In order to determine whether or not any of the PCB impacted soil was inadvertently transferred to these sites, CES proposes, on behalf of RH Law, to conduct sampling and analysis of the top soil in question at the five locations.

### ***Sampling Plan***

CES proposes to collect the soil samples as follows:

- For areas that are narrow and long in shape, the area will be sectioned off into approximate twenty foot (20') linear sections. Six (6) to seven (7) grab samples will be collected from each section and composited into one (1) soil sample for analysis.

Mr. Warner

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- For larger areas, the area will be sectioned off into approximate twenty foot (20') by twenty foot (20') sections. Six (6) to seven (7) grab samples will be collected from each section and composited into one (1) soil sample for analysis.
- The sections will be marked off in the field using either stakes, iron pins, flags or similar type items for future use in determining the extent of the areas that may be impacted.
- Samples will be collected from the surface (excluding sod/grass/etc.) to approximately four to six inches (4-6") deep on average or to the bottom of the top soil layer.
- The composite soil samples will be submitted to CES's New York State Department of Health (NYSDOH) Environmental Laboratory Approval Program (ELAP) approved laboratory (ELAP #11246) or another ELAP approved laboratory for PCB analysis via Method 8082.
- One (1) set of Split/Duplicate samples will be collected from each of the five sites.

Once this proposed sampling plan has been approved by the NYSDEC, it is the intent to provide NYSDEC personnel forty eight (48) hours notice prior to on-site sampling. Once the results from the sampling are received, a corrective action plan for NYSDEC approval will be developed to address any impacts, if any, identified. In general it is understood that any areas found to contain greater than one parts per million (>1 ppm) total detected PCB's would need to be removed.

If you have any questions regarding this project, or if I can be of assistance on any other matter, please do not hesitate to call me at (315) 478-2374, extension 308.

Sincerely,

**CERTIFIED ENVIRONMENTAL SERVICES, INC.**

*Nicole R. Copeland*

Nicole R. Copeland  
Technical Services Manager